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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

In re:

SALMA H. AGHA,
 Debtor.

Case No. 10-16183-A-7

Chapter 7

DC No. [none identified in moving documents]

DECLARATION OF CONNIE M. PARKER IN SUPPORT OF CHAPTER 7 TRUSTEE JEFFREY VETTER'S OPPOSITION TO DEBTOR'S MOTION TO DISQUALIFY KLEIN, DENATALE, GOLDNER

Date: February 5, 2015

Time: 9:00 a.m.

Place: U.S. Bankruptcy Court
 1300 18th Street, Ste. A
 Bakersfield, California

Judge: Hon. W. Richard Lee

I, CONNIE M. PARKER, declare as follows:

1. I am a licensed California attorney and partner with the law firm Klein, DeNatale, Goldner, Cooper, Rosenlieb & Kimball, LLP ("Klein, DeNatale"). I practice in the area of bankruptcy and general civil litigation. From my work on this and a related case, I have personal knowledge of the following:

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1 2. In February 2014, Debtor filed a lawsuit against Honorable Fredrick Clement,
2 Klein, DeNatale, Chapter 7 Trustee, Jeffrey Vetter ("Trustee") and others in Los Angeles
3 County Superior Court. The lawsuit attempts to allege various tort-type theories arising from
4 the administration of Debtor's Chapter 7 proceeding.

5 3. The United States Attorneys' office removed the lawsuit to the United States Court
6 Central District of California, where the lawsuit remains pending. The case is entitled, *Salma*
7 *Agha-Khan, M.D. v. United States of America, et. al.*, United States Court, Central District of
8 California Case No.: CV 14-03490 FMO. I believe the court records, which are voluminous
9 due to the length of Debtor's pleadings and number of parties, are accessible via PACER. For
10 reference purposes, I am submitting a true and correct copy of the first page of Debtor's
11 operative complaint, i.e., the second amended complaint, as Exhibit "E."

12 4. As an attorney with Klein, DeNatale, I am handling Klein, DeNatale's and Trustee's
13 defense in that lawsuit. Trustee waived the conflict-of-interest posed by the dual representation
14 of Klein, DeNatale and Vetter in that lawsuit. Due to Klein, DeNatale's background
15 representing Trustee in the bankruptcy proceeding, Trustee preferred that Klein, DeNatale
16 continue to represent him in the related lawsuit.

17 5. The lawsuit is pending various motions to dismiss filed by Klein, DeNatale and
18 other defendants in the case. Klein, DeNatale filed a motion to dismiss the second amended
19 complaint, without leave to amend, based on *Barton v. Barbour*, 104 U.S. 126 (1881),
20 amongst other procedural issues.

21 6. Debtor's disqualification motion is somewhat of a contradiction considering her
22 prosecution of a lawsuit naming Klein, DeNatale and Trustee. Notwithstanding any
23 disqualification, Klein, DeNatale would be appearing in Debtor's related lawsuit, arising from
24 the administration of Debtor's Chapter 7 proceeding, as a co-defendant with Trustee.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This declaration is executed on January 22 2015 in Fresno, California.

CONNIE M. PARKER